

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
EVANSVILLE DIVISION

IN RE: )  
FUHRMAN FARMS, LLC, ) CASE NO. 13-71007-BHL-12  
Debtor )

**OBJECTION TO CLAIM #18 OF NAU COUNTRY INSURANCE  
AND NOTICE OF RESPONSE DEADLINE**

Debtor, Fuhrman Farms, LLC, by counsel, Michael J. Hayden, respectfully objects to the claim filed herein by NAU Country Insurance (Claim #18). In support thereof, Debtor states:

1. Debtor objects to the claim because, on the application for crop insurance, there was a statement that Debtor's principals were new farmers with respect to Dubois County, and this statement was untrue. Tom Fuhrman in particular has, and had at the time of the application, extensive experience farming in Dubois County.

2. Because of the incorrect statement on the application, the claim is overstated for all portions of the claim based upon farming activities that took place in Dubois County.

3. The claim should be disallowed to the extent that it is based upon the Debtor and/or its principals lacking any previous experience farming in Dubois County.

4. However, if the claimant fails to respond to this objection, so as to allow the Court to determine what the actual claim should be, the claim should be disallowed in its entirety regarding all claims having to do with activities in Dubois County.

5. Debtor also objects to the inclusion in the claim of any interest at all which is part of the claim which was incurred after the date the Debtor's petition was filed, June 25, 2013.

**NOTICE IS GIVEN** that any response must be filed with the Bankruptcy Clerk within **30 days** from date of service (or such other time period as may be permitted by Fed.R.Bankr.P. 9006(f)). Those not required or not permitted to file electronically must deliver any response by U.S. mail, courier, overnight/express mail, or in person at: 352 Federal Bldg., 101 NW M.L. King Jr. Blvd., Evansville, IN 47708. The responding party must ensure delivery of the response to the party filing the objection. **If a response is NOT timely filed, the requested relief may be granted.** If a response is filed, a hearing will be set at a later date, and all parties will receive a notice of that hearing.

WHEREFORE, Debtor prays for an order disallowing Claim #18 of NAU Country Insurance, in whole or in part, as the case may be, and for all other relief which is proper in the premises.

/s/ Michael J. Hayden  
MICHAEL J. HAYDEN  
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ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on the 7<sup>th</sup> day of April, 2015, a copy of the foregoing Debtor's Objection to Claim #18 of NAU Country Insurance and Notice of Response Deadline was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

U.S. Trustee  
[ustpreion10.in.ecf@usdoj.gov](mailto:ustpreion10.in.ecf@usdoj.gov)

Joseph M. Black  
[jmbecf@trustee13.com](mailto:jmbecf@trustee13.com)  
[jmbecf@cinergymetro.net](mailto:jmbecf@cinergymetro.net)

I further certify that on the 7<sup>th</sup> day of April, 2015, a copy of the foregoing Debtor's Objection to Claim #18 of NAU Country Insurance and Notice of Response Deadline was mailed by first-class U.S. Mail, postage prepaid, and properly addressed to the following:

NAU Country Insurance  
7333 Sunwood Drive  
Ramsey, MN 55303

/s/ Michael J. Hayden  
MICHAEL J. HAYDEN